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Received & Inspected

April 2, 2015

APR 13 2015

The Honorable Tom Wheeler
Federal Communications Commission
Chairman
445 12th Street SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

FCC Mail Room

Re: *Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions*, Docket No. 12-268; *Policies Regarding Mobile Spectrum Holdings*, WT Docket No. 12-269

Dear Chairman Wheeler:

The 600 MHz incentive auction scheduled for early next year promises greater access to wireless broadband services in urban and rural areas throughout America. Low-band transmissions travel farther than high-band transmissions can, which increases wireless broadband reliability and lowers costs. Conducting the 600 MHz incentive auction as planned in early 2016 will help ensure American consumers enjoy these benefits as soon as possible.

The Federal Communications Commission must also ensure that multiple facilities-based competitors have an opportunity to secure low-band spectrum throughout the country. More competitors with access to critical low-band spectrum resources will mean expanded choice, increased investment, greater efficiency, and more innovation throughout the wireless broadband market.

The best way to encourage wireless broadband competition is to increase the amount of the spectrum reserved for non-dominant providers in the 600 MHz incentive auction. Increasing the size of the reserve from 30 MHz to 40 MHz of spectrum or 50 percent of what is made available will enable competitive carriers to offer the types of robust broadband services that consumers demand.

To ensure multiple bidders benefit from the competitive opportunity the spectrum reserve provides, no one bidder should be permitted to acquire all the spectrum in the reserves. The Commission, therefore, should prohibit any one reserve-eligible bidder from acquiring more than a total of 20 MHz of reserve spectrum in any given market.

The recently concluded AWS-3 auction netted some \$42 billion for the US Treasury. These record-shattering revenues fully fund the First Responder Network Authority ("FirstNet") as well as other fund-raising objectives Congress sought to secure through spectrum auctions. With FirstNet's funding requirements under the Middle Class Tax Relief and Job Creation Act of 2012 now beyond question, the Commission can turn its full attention to promoting robust wireless competition for the benefit of American consumers everywhere.

The incentive auction represents what is likely the last opportunity for any wireless service provider to acquire low-band spectrum in the United States. Conducting the incentive auction in early 2016 as scheduled while adopting policies that allow multiple facilities-based competitors to secure meaningful quantities of low-band spectrum promises to protect consumer choice and innovation in the wireless broadband market for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Duff', with a long horizontal line extending to the right.

Bob Duff
Majority Leader

CC: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly